

BOULT
CUMMINGS
CONNERS
& BERRY
'01 APR 6 PM 2 05

LAW OFFICES
414 UNION STREET, SUITE 1600
POST OFFICE BOX 198052
NASHVILLE, TENNESSEE 37219
OFFICE OF THE
EXECUTIVE SECRETARY

Henry Walker
(615) 252-2363
Fax: (615) 252-6363
Email: hwalker@bccb.com

TELEPHONE (615) 244-2582
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INTERNET WEB <http://www.bccb.com/>

April 6, 2001

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

Re: Docket to Establish Generic Performance Measurements, Benchmarks and
Enforcement Mechanisms for BellSouth Telecommunications, Inc.
Docket No. 01-00193

Dear David:

Enclosed are the original and thirteen copies of Comments filed on behalf of
ATM/Discount Communications, Inc. in the above-captioned proceeding.

Sincerely,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: *Henry Walker by wrm*
Henry Walker *w/permission*

HW/nl
Attachment
c: Parties

BEFORE THE TENNESSEE REGULATORY AUTHORITY

In Re: Docket to Establish Generic)
Performance Measurements, Benchmarks) Docket No. 01-00193
and Enforcement Mechanisms for)
BellSouth Telecommunications, Inc.)

COMMENTS OF ATM/DISCOUNT COMMUNICATIONS, INC.

ATM/Discount Communications, Inc. ("Discount") submits the following initial comments concerning the Tennessee Regulatory Authority's ("TRA") investigation of generic performance measurements and enforcement mechanisms for BellSouth Telecommunications, Inc. ("BellSouth").

Unlike the other participants in this docket, Discount is a local reseller and uses BellSouth's operational support systems (primarily "LENS") to place local service requests, not to order unbundled network elements.

To a pre-pay telephone carrier such as Discount, the prompt and accurate handling of local service requests is critical to the carrier's day-to-day operations. For example, a Discount customer often does not pay his telephone bill until after his service has been suspended. Discount, therefore, places an order with BellSouth, through LENS, requesting that service be suspended. When the customer pays the bill, Discount places an order for the service to be restored. These continued suspensions and restorations of service must be quickly executed in order to be effective and to keep the customer.

While Discount believes that BellSouth promptly and accurately handles local service requests for BellSouth's own customers, BellSouth is apparently unable, or unwilling, to handle requests placed by Discount in the same, non-discriminatory manner. To put it simply,

LENS does not work. And when it does, local service requests are mishandled, delayed, or just forgotten on regular basis.

Over the last three months, Discount has been keeping a written record of these problems and made a practice of notifying BellSouth whenever such problems occur. Attached is a sample of that correspondence. LENS, for example, was down for six days and three partial days in January. When LENS is down, Discount tries to place orders manually to the "LCSC" where, typically, telephones ring unanswered, faxes are ignored, and BellSouth representatives are unhelpful, if not rude. (See letter dated December 15, 2000.) In one case, an LCSC representative informed Discount the LCSC "does not process orders after 3 p.m. on Saturday," although Discount had placed orders on Saturday afternoons many times in the past. Believing that BellSouth would process orders for its own customers, Discount vice president Morris Harris personally visited a BellSouth payment center on that same Saturday at 5 p.m. He paid the overdue bill of a BellSouth customer and asked that the customer's service be restored. Service was restored that same afternoon. See letter of January 24, 2001 and attachments.

These are some examples of the ongoing problems faced by Discount and, presumably, other resellers. Strict performance measures and enforcement mechanisms are the only solution. But the generic formula adopted in the DeltaCom arbitration may not be sufficient. The fact is, every time LENS is down, Discount loses business. Every time an order to suspend or restore service is delayed, Discount loses business. BellSouth should be held responsible, in some way, for each such incident. For example, if Discount places a confirmed, suspension order but the order is not executed on the scheduled date, BellSouth should waive any restoration

fee. Similarly, if LENS is down, BellSouth should waive all charges for placing service orders and pay penalties for delays in executing those Orders.

Discount strongly urges the TRA to schedule hearings concerning these service problems. It is important for the TRA to hear first-hand how BellSouth has utterly failed to establish reliable workable OSS interfaces for competitive carriers. This testimony will become even more significant should BellSouth file a Section 271 application. Regardless of what claims BellSouth may make in other states, about "LENS" or the LCSC, it is clear that, in Tennessee at least, those systems cannot support the needs of even a small competitor like Discount.

Finally, Discount has agreed to take these performance issues out of Discount's pending arbitration proceeding and to address these issues in this generic docket. But if these proceedings are intended to substitute for an arbitration case, Discount requests the same opportunity to present testimony and cross-examine witnesses in the generic docket that would be available in Discount's arbitration.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: Henry Walker Sydnor w/permission
Henry Walker
414 Union Street, Suite 1600
P.O. Box 198062
Nashville, Tennessee 37219
(615) 252-2363
Counsel for ATM/Discount Communications, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via U.S. Mail, postage prepaid, to the following on this the ~~6~~th day of April, 2001.

Guy Hicks, Esq.
BellSouth Telecommunications, Inc.
333 Commerce St.
Suite 2101
Nashville, TN 37201-3300

Jim Lamoureux, Esq.
AT&T Communications of the South Central States
Room 8068
1200 Peachtree St., NE
Atlanta, GA 30309

Tim Phillips, Esq.
Office of the Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, TN 37202

Henry Walker by WLM w/permission
Henry Walker

ATTACHMENTS



ATM/Discount Communications Inc.
"Your Complete Telecommunications Provider"

3798 Park Avenue
Memphis, TN 38117-6649
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Toll Free 888 639-0669
Fax... (901) 327-2809
www.atm-disc.com

RECEIVED DEC 7 2000

December 6, 2000

Henry Walker, Esquire
Boul, Cummings, Conners & Berry PLC
Law Offices
414 Union Street, Suite 1600
P.O. Box 198062
Nashville, TN 37219

Re: Downtime/BellSouth's Lens Ordering System

Dear Mr. Walker:

Please be advised of the ongoing problems while trying to process orders.

Friday, December 1st - 8:00 am. Spoke with Sonja, ESC Support. Placed a second call at 4:30 p.m. Was informed that the Lens System was up. Attempted to process an order. Could not access. Placed a third call and spoke with Byron. Byron said he would follow up and call back with an answer.

Monday, December 4th - 8:30 am. Spoke with Sharon. Was informed that Lens was down, and they are experiencing problems. Attempted to process an order. Could not access.

Tuesday, December 5th - 9:00 am. Spoke with Byron. Was informed that Lens was still down. Placed a call and got a recording informing me that Lens will be down for most of the day.

Wednesday, December 6th - 8:30 am. Spoke with Sharon. Was informed that they are experiencing problems but the system is now working. Attempted to process an order. Lens was not properly working. Placed a second call at 10:00 a.m. Spoke with Byron. Byron said he would follow up and call back with an answer.

Sincerely

Morris "Nick" Harris

KM/dj

cc: File

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December 9, 2000

Henry Walker, Esquire
Boult, Cummings, Conners & Berry PLC
Law Offices
414 Union Street, Suite 1600

Re: ATM/Discount Communications' Complaints against BellSouth

Dear Mr. Walker:

Friday, October 19th & 20th - Re: Waketa Carpenter - PON 033100121402, Randy Irving - P ON 092100175910, Brand Williams - PON 080400154825
BellSouth feature "Area Plus" was offered to these customers. When we attempted to add this feature the LENS System rejected it. Called BellSouth and was informed by BellSouth reps that this feature was not available. As a result, customers were issued refunds.

Friday, October 20th - 9:00 a.m. - Re: Nathala Lee - PON 091800155204
Customer's services were not on. Spoke with Shondria who informed me that there were no line records. Called LCSC. After being placed on hold for approximately 28 minutes, spoke with Jocelyn. Systems shows that BellSouth had cancelled the order without our permission. We were informed that the order would be reissued, however our customer left upset.

Friday, October 20th - 10:25 a.m. LENS System is down. Placed a call to EC Support. Waiting on a return call. 2:00 p.m. LENS System is now working.

Friday, October 20th, 11:00 a.m. - Re: Bobby Bowdery - PON 101700113427
Called in for repair. BellSouth's technician went out and informed us that the problem was inside. Problem had not been resolved. Send one of our technicians out. Found that the interface had no power. BellSouth's technician agreed that this was in fact the problem. Total number of attempts to call BellSouth to help resolve the problem, five. Consequently, we lost the customer.

"Your Complete Telecommunications Provider"

Henry Walker, Esquire
December 9, 2000
Page 2

Friday, October 20th, 12:00 p.m. - Re: Gail Hawthorne - PON 100400174701
Customer's service was not completed as schedule. Features were not applied correctly delaying scheduled due date. To compensate the customer for this delay we gave her one month of free service.

Friday, October 27th, 8:00 a.m. - Re: Yolanda Jones - PON 072899111200
Conversion, however, BellSouth had assigned the customer a new number without informing us. The FOC date was 9/25/00. Actual date of completion was 10/26/00.

Friday, December 8th - Re: Takesha Rideout - PON 111500124600
Please find the attached.

Sincerely,



Morris "Nick" Harris

MH/dj

Enclosed

"Your Complete Telecommunications Provider"

Service Order List with TN of '9017851206'
Sorted by Current DD

Position	PCN	SO	APP DATE	TN	Status (SR)	Days In Status	Current DD	List Name
1	111500124600	C9ND4155	11/21/00	9017851206021	CP	16	11/22/00	RIDEOUT, TAKESHA

<< < 20 > >> 1-1 of 1 service orders matching your criteria [Download results to Excel](#)

CUSTOMER SERVICE WAS COMPLETED ON 11/22/00, but
Bousouth did not bill the CSR correctly AND
The customer old CLEC WAS ABLE TO DISCONNECT
The customer EVEN THOUGH he had become a Discount
Communication Customer

vice Order Detail

Service Order C9ND4155

Last Pass Received: 11/22/00 6:01:11 PM
Days in Current Status: 16

CPX013 CND415	901785	AM	-	-	Y	N
901 785-1206F 021 11-22- 00 MPWW		11	-	21-00	1252	11-21
C9ND4155B VR3CL YAXQBCJ 11-		27	-	00	WSP	

Number of times in this status: 013

ZRTI N,Q8,800 773-4967,VAL,205321
CENT ROX
OTN 901 785-1206-020
SD 11-22-00

---LIST

LN RIDEOUT, TAKESHA
LA 920 NORFLEET AV
SA 920 NORFLEET AV, MEMPHIS, TN
DZIP 38109

---BILL

IBN1 DISCOUNT COMM INC
IBA2 3340 POPULAR AV
IBA3 SUITE 301
IPO MEMPHIS TN 38111
IRESH R8844
GRESH R6043
TAR 111,702
ITAX 0010
IBTN 615 Q84-5095-095
OBTN 615 Q82-6244-624
IDCR RT
ISS 000-00-0000;N
IBI RCN
MAN R6043
IZPTX Y
IPON 111500124600
IRTX F S C T
ICEN1 IMAGE ACCESS INC
ICBA2 3322 HESSMER AVENUE
ICPO METAKIRIE LA 70002

---S&E

II RESCN/ZRCI DISCOUNT COMM,901/ 795-0067, MORRIS HARRIS
/TN 901 785-1206
C1 VR3CL/TN 901 785-1206/TRE A/PIC NONE/LPIC NONE/PCA OF, 05-02-00
/LPCA OF, 05-02-00/NMC /SED 05-04-00/ZSER 3C10000001
T1 VR3CL/TN 901 785-1206/TRE A/PIC 0333/LPIC 0333/PCA OF, 11-21-00
/LPCA OF, 11-21-00/ZLLU /NMC /PN
C1 CREX1/TN 901 785-1206/SED 05-04-00/ZSER 4310000002
/RMKR (A) 05-02-00
T1 CREX3/TN 901 785-1206
II DRS/TN 901 785-3850/PN 901 785-1206/RNP C
II ESF
II ESL
R1 ESC/TN 901 785-1206/SED 05-04-00/ZSER 4A10000003
R1 ESM/TN 901 785-1206/SED 05-04-00/ZSER 5110000004
C1 ESXDC/TN 901 785-1206/SED 05-04-00/ZSER 5810000005
T1 ESX/TN 901 785-1206

12/8/2000 11:56 /

Apr-06-2001 12:19 From-

T-033 P.017/028 F-440

DEC 09 '00 11:40 PM

<https://slcrview.bellsouth.com/scripts/PrintableSQL.asp?id=11321663>

Service Order Detail

T1 ASSEC
I1 SOMECC
O1 INPCX/TN 901 785-1206
B1 NSQ/TN 901 785-1206/SED 05-04-00/ZSER 6610000007
R1 NSS/TN 901 785-1206/SED 05-04-00/ZSER 6D10000008
R1 NDCR/TN 901 785-1206/SED 05-04-00/ZSER 7410000009
R1 RESCH/TN 901 785-1206/ERCI IMAGE ACCESS INC,RICHARD
/CHAUBERT, 504 894-9363/SED 05-04-00/ZSER 7H1000000A
R1 VSB/TN 901 785-1206/SED 05-04-00/ZSER 921000000B
C1 SIM/TN 901 785-1206/SED 05-04-00/ZSER 891000000C
T1 SIM/TN 901 785-1206/ZILLU

---STAT
SWO NF1



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RECEIVED DEC 27 2000

December 15, 2000

-- Ms. Pat Ward, Manager
BellSouth LCSC Interconnection Services
600 North 19th Street, 14th Floor
Birmingham, AL 35203

Dear Ms. Ward:

RE: LCSC Support

On Thursday, December 14th in an attempt to resolve an order pending processing
Re: Treva Wilson, - PON 120200115840, we placed a call to LCSC. Your service
representative, Dwayne answered the call.

It is my opinion that the call was handled inappropriately by Dwayne. My employee felt
that he was insulting, and that his remarks were uncalled for. After being "put on hold"
for a long period of time the call was abruptly disconnected.

We are experiencing too much downtime being "put on hold" for long periods of time,
and waiting on return calls. We need your assistance in expediting our orders.

Sincerely,

Morris Harris Sr.

MH/dj

cc: Henry Walker Esquire

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December 16, 2000

Mr. Jim Brinkley, Senior Director
BellSouth Interconnection Services
675 West Peachtree Street
Atlanta, GA 30375

Dear Mr. Brinkley:

In reply to: Lens Downtime -- Notification dated December 16, 2000

This letter is written to express ongoing issues with regards to LENS downtime. As you know, without access to the LENS System, Resellers are literally at a stand still. This interruption for even the shortest period of time gravely affects our business.

These untimely alerts (notifications received on the day of) are unacceptable, and inexcusable. We have estimated a projected loss of approximately \$20,000.00. Further, it is our belief that BellSouth is not being affected at all by this but continues "doing business as usual".

We sincerely believe that your customers are valuable to you. Our customers are extremely valuable to ATM/Discount Communications. We take pride in doing good ethical business. This burden is both damaging and costly.

To this end, in the future, we would appreciate reasonably advanced notifications so that we can be more prepared for serving our customers.

Sincerely,

A handwritten signature in cursive script, appearing to read "Morris Harris Sr.".

Morris Harris Sr.

MH/dj

CC: Henry Walker Esquire, Boulton, Cummings, Connors & Berry PLC

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January 24, 2001
Via Certified Mail

Mr. Jim Brinkley, Senior Director
BellSouth LCSC Interconnection Services
675 West Peachtree Street
Atlanta, GA 30375

Dear Mr. Brinkley:

We are in receipt of a letter from David Stark dated January 11th. However, correspondence was sent to you because of the problems we are experiencing due to an overwhelming amount of "LENS" downtime.

The position of reselling, per the "Agreement" states that the Reseller is permitted to make the same allowances and use the same resources to help satisfy our customers as BellSouth has for satisfying their customers.

We believe that during these "LENS" downtime periods, BellSouth is still able to; or has alternative methods they use that will not prevent the processing of orders. We expect that we should have the same capability

Though these alerts may be a courtesy to us, downtime still presents a negative impact on our business.

Respectfully,

Morris Harris SR, Vice President

MH/dj

cc: Henry Walker, Esquire, BOWT, Cummings
Connors & Berry, PLLC

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January 24, 2001
Via Certified Mail

Ms. Tonya Harding, Customer Support Manager
BellSouth LCSC Interconnection Services
600 19th Street, 20th Floor
Birmingham, AL 35203

Dear Ms. Harding:

RE: Complaint for Customer Service Support


On Saturday, January 20, 2001 a number of restoration orders were submitted via fax to LCSC for processing (enclosed list).

Surprisingly, we were told that LCSC does not process orders on Saturdays after 3:00 p.m.

Coincidentally, we found that on this day, Saturday, January 21, 2001, a BellSouth customer, Ms. Shawna Miles of 1018 N. Watkins St., #6, Memphis, TN 38107, (901) 278-8851 visited BellSouth long after 3:00 p.m., paid a restoration fee and her service where; in fact, restored that day (Receipt of transaction also enclosed).

In an effort to continue doing good business, we rely on our ability to practice good ethical business laws. It is our opinion that these practices help us retain our accounts. Given our relationship, it is unclear to us BellSouth's resistance in processing our orders.

Please respond to this concern.


Morris Harris, Vice President
MH/dj

Enclosures

CC: Janet Miller, Director Customer Support
Jim Brinkley, Senior Director LCSC Interconnection Services
Henry Walker, Esquire, Boulton, Cummings, Connors & Berry, PLC

"Your Complete Telecommunications Provider"

BellSouth LCSC Interconnection Services
January 24, 2001
Page 2 - Attachments

Name	Telephone Number	PON
Tomika Abram	901-527-2608	64300120-R
Jennifer Sandridge	901-353-5194	61590120-R
Ramona Metcalf	901-526-5561	59340120-R
Renee Simmons	615-264-1808	60860120-R
Christopher Jackson	615-353-1796	25390120-R
Anayeli Ramirez	901-380-4306	37760120-R
Pananetta Hoyle	901-324-9948	58270120-R
Genia Word	615-443-3721	28880120-R
Angelia Bills	901-579-0781	53900120-R
Betty Joy Lambert	901-357-7212	11280120-R
Vita West	901-774-5863	23860120-R
Angela Webb	901-365-9099	52050120-R
Angela Webb	901-369-9538	52060120-R
Lawrence Simmons	901-452-6132	48250120-R

BELLSOUTH

PIGGLY WIGGLY CHADRON

40T 1432 0067 01/20/01 17:05

Payment 901 2788951 221 \$63.00
Cash In (\$63.00)

Total Amount Paid: \$63.00

We Appreciate Your Business!

Your payment will post to your
BellSouth account within minutes

THANK YOU



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January 29, 2001
Via Certified Mail

Ms. Tonya Harding, Customer Support Manager
BellSouth LSCS Interconnection Services
600 North 19th Street, 20th Floor
Birmingham, AL 35203

Dear Ms. Harding:

RE: Error/Clarification -PON #012301112014 - Date Submitted 01/23/01

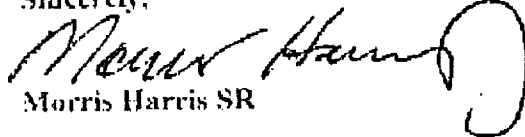
I am forwarding the enclosed PON that was rejected. The explanation states
"request to add Link-Up after service is established is not permitted."

First and foremost, this is a new customer for ATM/Discount. This is a conversion.
Secondly, the customer qualifies for the Link-up Program.

It is not ATM/Discount's responsibility for information, or the lack of, taken from
previous carriers. Moreover, ATM/Discount stands in compliance with FCC
standard regulations, and embraces the Program. Therefore, it is our obligation to
first determine a customer's status in order to submit our request properly.
BellSouth's interpretation of the standard regulations is clearly in error.

We are losing valuable time having orders rejected that should be processed without
dispute. This is a simple "request for service", that meets the Link-Up Program
requirements. Please expedite this order accordingly.

Sincerely,


Morris Harris SR

MH/dj
Enclosed

Cc: Janet Miller, Director Customer Support
Jim Brinkley, Senior Director LCSC Interconnection
Henry Walker, Esquire, Boulton, Cummings, Connors & Berry, P.L.C.

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DISCOUNT COMMUNICATIONS CUS 8844
012501153117 v 00



Local Exchange Navigation System

View LSR/Order Information **P O N** Details

PON	Version	Date Submitted	Error/ Clarification
012501153117	00	2001-01-25	2001-01-26

2001-01-26 THIS NUMBER IS A FINAL ACCOUNT. SEND AS A NEW CONNECT
2001-01-25 USOC ALREADY EXISTS ON CUSTOMER RECORD

References

Main Menu

[Return to LSR/Order Info](#)
[Main](#) ►

Copyright 2001 -- BellSouth Telecommunications, Inc. -- All Rights Reserved
[ENS Version 9.0.1]

Z884412

1/29/2001



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January 30, 2001

Ms. Tonya Harding, Customer Support Manager
BellSouth LCSC Interconnection Services
600 North 19th Street, 20th Floor
Birmingham, AL 35203

Dear Ms. Harding:

RE: LENS Downtime

This letter is written to inform you that we've been incapable of accessing the LENS System the entire day.

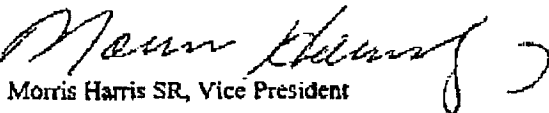
And, for the record, the following is a schedule of dates for the month of January that we've experienced LENS downtime.

<u>Date</u>	<u>Downtime</u>
01/05/01	10:30 a.m. - until day-end
01/09/01	Entire Day
01/12/01	Entire Day
01/13/01	Entire Day
01/16/01	Entire Day
01/17/01	Entire Day
01/18/01	On & off - until day-end
01/29/01	8:30 a.m. - until day-end

As stated in previous correspondence, we believe that BellSouth is not being affected at all by this downtime. We also believe that there may be an alternative method for processing orders during LENS downtime.

Not only are we unable to process new orders, we are unable to service existing customers. We have addressed this issue time and time again to no avail. We continue to lose valuable time and money. We expect a better understanding of BellSouth's System's capability in order to process our orders.

Please respond.


Morris Harris SR, Vice President

MH/dj

Cc: Janet Miller- Fields, Director Customer Support
Jim Brinkley, Senior Director LCSC Interconnection Services
Henry Walker, Esquire, Boult, Cummings, Connors & Berry, PLC

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February 26, 2001
Via Certified Mail

Ms. Tonya Harding, Customer Service Manager
BellSouth LSCS Interconnection Services
600 North 19th Street, 20th Floor
Birmingham, AL 35203

Dear Ms. Harding:

RE: Lens Downtime

This letter is written informing you of the lack of support BellSouth is providing us. Attached is a list of accounts that should have been processed on Saturday, February 24, 2001 for restoration of services.

As you know, ATM/Discount was unable to process these orders because the LENS System was down, "ALL DAY".

This is just another example of BellSouth's lack of support when it comes to working with ATM/Discount.

Due to this constant, unresolved issue, ATM/Discount feels we should not incur restoration charges for those listed.

Morris Harris SR. Vice President

MH/dj

Enclosed

Janet Miller-Fields, Director Customer Service
Cc: Jim Brinkley, Senior Director, BellSouth Interconnection Services
Henry Walker, Esquire, Boulton, Cummings, Connors & Berry, PLC

"Your Complete Telecommunications Provider"

LENS Downtime Cont.

Restoration of Service Requests

<u>PON</u>	<u>Phone Number</u>
13500223-R	901-323-0426
65580233-R	901-348-2276
60500223-R	901-357-9587
44480226-R	901-744-4297
54150226-R	901-454-0785
53400226-R	615-226-1732
32530226-R	901-745-5586
31030226-R	901-818-9275
56400226-R	901-327-2237
66150226-R	931-503-0197
57380226-R	901-368-6479
30820226-R	901-794-0196
37170226-R	901-360-9920
62490026-R	901-324-1747
26270226-R	901-354-2055
54340226-R	901-366-5509
66000226-R	901-745-1024
24170226-R	901-354-9571
45210226-R	901-743-5284
17750226-R	901-789-0542

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February 28, 2001
Via Certified Mail

Ms. Tonya Harding, Customer Support Manager
BellSouth LCSC Interconnection Services
600 North 19th Street, 20th Floor
Birmingham, AL 35203

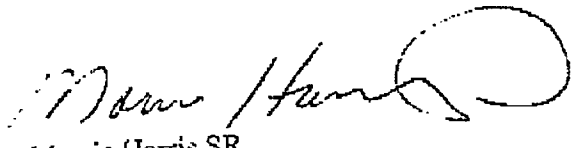
Dear Ms. Harding:

For the record, the following is a schedule of dates for the month of February that ATM/Discount experienced LENS Downtime.

<u>Date</u>	<u>Downtime</u>	<u>Date</u>	<u>Downtime</u>
02/03/01	Partial Day	02/15/01	Entire Day
02/05/01	Entire Day	02/16/01	Entire Day
02/07/01	Entire Day	02/19/01	Entire Day
02/09/01	Entire Day	02/22/01	Entire Day
02/12/01	Entire Day	02/23/01	Entire Day
02/14/01	Entire Day	02/24/01	Entire Day

This matter was addressed in previous correspondence (dated January 30, 2001). Clearly, downtime has increased on our end. The explanation is BellSouth is "updating their system".

Will you interpret for us the meaning of "Updating BellSouth's System," so that we can better understand the capabilities of a System that we have access to that continues to delay the processing of our orders.


Morris Harris SR

MH/dj

Cc: Janet Miller-Field, Director of Customer Support
Jim Brinkley, Senior Director LCSC Interconnection Services
Henry Walker, Esquire, Boulton, Cummings, Connors & Berry, PLC

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